



Service of Process Transmittal Summary

TO: KIM LUNDY- EMAIL
Walmart Inc.
GLOBAL GOVERNANCE/CENTRAL INTAKE, 2914 SE I STREET MS#0200
BENTONVILLE, AR 72712-3148

RE: Process Served in Washington

FOR: WALMART INC. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: Archer Teresa L., a married person individually // To: WALMART INC.
Name discrepancy noted.

DOCUMENT(S) SERVED: Summons, Complaint, Order(s)

COURT/AGENCY: Pierce County Superior Court, Washington, WA
Case # 222067239

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 08/09/2020, Walmart Supercenter #3525 located at
16502 Meridian E., Puyallup, WA, 98375

PROCESS SERVED ON: CT Corporation System, Olympia, WA

DATE/METHOD OF SERVICE: By Process Server on 06/23/2022 at 15:08

JURISDICTION SERVED: Washington

APPEARANCE OR ANSWER DUE: Within 20 days after service, excluding the date of service

ATTORNEY(S)/SENDER(S): Robert D. Bohm
Robert D. Bohm, PLLC
P.O. Box 25536
Federal Way, WA 98093
206-463-6767

ACTION ITEMS: CT has retained the current log, Retain Date: 06/24/2022, Expected Purge Date:
06/29/2022
Image SOP

REGISTERED AGENT CONTACT: C T Corporation System
711 Capitol Way S
Suite 204
Olympia, WA 98501
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT



CT Corporation
Service of Process Notification

06/23/2022

CT Log Number 541801924

disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

June 02 2022 8:30 AM

CONSTANCE R. WHITE
COUNTY CLERK
NO: 22-2-06723-9IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF PIERCE

Teresa L. Archer, a married person individually,

Plaintiffs,

vs.

WALMART, INC.; WAL-MART REAL
ESTATE BUSINESS TRUST; WAL-MART
REALTY COMPANY, each business entities
licensed to conduct business in the state of
Washington; ROES I-X; BLACK AND WHITE
I-V, entities licensed to conduct business in the
state of Washington,

Defendants.

NO.

SUMMONS

Walmart, Inc.

TO THE DEFENDANT:

A lawsuit has been started against you in the above-entitled Court by the plaintiff. Plaintiff's claims are stated in a written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the person signing this Summons within twenty (20) days after the service of this Summons, excluding the date of service, or within sixty (60)

Complaint for Damages - 1

Robert D. Bohm, PLLC
P.O. Box 25536
Federal Way, WA 98093
(206) 463-6767
rdbohm@premisesinjurylaw.com

1 days if this Summons was served outside the State of Washington, or a Default Judgment may be
2 entered against you without notice. A Default Judgment is one where the plaintiff is entitled to
3 what s/he asked for because you have not responded. If you serve a Notice of Appearance on the
4 undersigned person, you are entitled to notice before a Default Judgment may be entered.

5 You may demand that the plaintiff file this lawsuit with the Court. If you do so, the
6 demand must be in writing and must be served upon the person signing this Summons. Within
7 fourteen (14) days after you serve the demand, the plaintiff must file this lawsuit with the Court,
8 or the service on you of this Summons and Complaint will be void.

9 If you wish to seek the advice of an attorney in this matter, you should do so promptly so
10 that your written response, if any, may be served on time.

11 This summons is issued pursuant to rule 4 of the Superior Court Civil Rules of the State
12 of Washington.
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14
15 DATED this 2nd day of June, 2022.

16
17 **ROBERT D. BOHM, PLLC**

18 /s/ Robert D. Bohm

19 Robert D. Bohm, WSBA # 42703
20 Attorney for Plaintiff
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June 02 2022 8:30 AM

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COUNTY CLERK
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Washington; ROES I-X; BLACK AND WHITE
I-V, entities licensed to conduct business in the
state of Washington,

Defendants.

NO.

COMPLAINT FOR PERSONAL INJURY
AND DAMAGES

Plaintiff, through counsel, alleges as follows:

I. JURISDICTION, VENUE, AND PARTIES

1. The action that forms the subject of this Complaint occurred in Pierce County, Washington.
2. Plaintiff Teresa L. Archer resides in Lakewood, Washington.
3. Defendant WALMART, INC. (hereinafter "WALMART") is a foreign corporation, authorized to do business in, and conducts business in, Washington state, and

possesses the shopping center premises known as "WALMART SUPERCENTER # 3525" located at 16502 Meridian E, Puyallup, WA 98375.

4. Defendant WAL-MART REAL ESTATE BUSINESS TRUST (hereinafter "WAL-MART RE TRUST") is a business entity authorized to do business in, and conducts business in, Washington state and owns and/or possesses the premises known as WALMART SUPERCENTER # 3525" located at 16502 Meridian E, Puyallup, WA 98375.
5. Defendant WAL-MART REALTY COMPANY (hereinafter "WAL-MART REALTY") is a foreign corporation, authorized to do business in, and conducts business in, Washington state, and owns and/or possesses the shopping center premises known as "WALMART SUPERCENTER # 3525" located at 16502 Meridian E, Puyallup, WA 98375.
6. Defendants ROES I-X and BLACK AND WHITE I-V are individuals, entities and/or organizations licensed to conduct business in the State of Washington whose identity is presently unknown at this time. Defendants Roes I-X and Black and White I-V are individuals and/or entities who created, placed or otherwise caused a dangerous condition to be present at the WALMART SUPERCENTER # 3525 in Puyallup, Washington, which caused Plaintiff's fall. Pursuant to CR 10(a)(2), Plaintiffs will amend their Complaint when the true names are discovered.
7. Venue is proper in this Court pursuant to RCW 4.12.025(1) and RCW 4.12.025(3) since one or more of the defendants reside in and/or do business in Pierce County, Washington.

II. FACTS

8. Plaintiff realleges each and every allegation contained in the foregoing paragraphs and incorporates the same herein by this reference.

9. On August 9, 2020, Plaintiff Teresa L. Archer was shopping at the WALMART SUPERCENTER # 3525.

10. Defendants WALMART, WAL-MART RE TRUST and WAL-MART REALTY jointly owed a duty of care to their invitees, including the Plaintiff, and are responsible for maintaining their premises in a reasonably safe condition for members of the public.

11. The condition of the parking lot, as it existed on August 9, 2020, and for substantial periods of time prior to said occurrence, constituted a dangerous, and/or hazardous, and latent condition.

12. Defendants, and each of them, either created and/or allowed said dangerous, and/or hazardous, condition to exist for a substantial period of time and otherwise had reasonable time and opportunity to correct the same.

13. On or about August 9, 2020, Plaintiff had been shopping at the WALMART and as such was a business invitee on the premises known as WALMART SUPERCENTER # 3525.

14. Plaintiff Teresa L. Archer tripped and fell over a deviation in the parking lot which was allowed to exist and/or was created by defendants in such a manner as to constitute a trip hazard.

15. As a direct and proximate result of said fall, Plaintiff Teresa L. Archer suffered serious injuries, including but not limited to injuries to her head, neck, right shoulder and right wrist, for which she received substantial medical care including surgery, physical therapy, occupational therapy, and other medical treatments.

III. LIABILITY

16. Plaintiffs reallege each and every allegation contained in the foregoing paragraphs and incorporates the same herein by this reference.

17. Defendants WALMART, WAL-MART RE TRUST and WAL-MART REALTY jointly owe a duty of care to members of the public who visit their premises and are responsible for maintaining the premises in a reasonably safe condition for the public, including the parking lot area.
18. Defendants, jointly and individually, should have reasonably foreseen that the deviation in the parking lot surface created a tripping hazard, and that the same was known, or should have been known, to be a hazard.
19. Defendants created, or allowed to exist, a dangerous condition either directly, or through their agents and or employees, in the parking lot where Plaintiff fell which resulted in Plaintiff's falling and severely injuring her person.
20. The above-described conduct of the Defendants, their agents and employees, Roes I-X, and Black and White I-V were negligent in several respects, including, but not limited to, creating an unreasonable risk of harm, failing to take reasonable precautions to protect visitors to its premises from foreseeable harm, and failing to adequately warn of the hazard.
21. The Defendants, their agents and employees, and/or Roes I-X, and Black and White I-V were owners, possessors, and occupiers of the premises and are liable for all physical injuries and emotional damages to Plaintiff, as an invitee to the premises, caused by the herein described condition on the premises because the Defendants, and each of them, created and/or knew of the condition or failed to exercise ordinary care to discover the condition, and should have realize it involved an unreasonable risk of harm to business invitees and guests, including Plaintiff. The Defendants should have expected that Plaintiff and other visitors to the store would not discover or realize the danger, or would fail to protect themselves against it, and failed to exercise ordinary care to protect Plaintiff and others from the danger.

22. The Defendants, through their agents and employees, and/or Roes I-X, and Black and White I-V breached its duty to exercise ordinary care for Plaintiff's safety. That breach proximately caused Plaintiff's injuries.

23. Defendants are solely at fault and liable to Plaintiff for her injuries. No other person or entity contributed to Plaintiff's injuries.

IV. DAMAGES

24. Plaintiff realleges each and every allegation in the foregoing paragraphs and incorporates the same herein by this reference.

25. As a direct and proximate result of Defendants' tortious acts, omissions and negligence, Plaintiff Teresa L. Archer suffered serious injuries. She has suffered, and will continue to suffer, significant pain, mental anguish, loss of enjoyment of life, as well as physical disability and injury. Plaintiff has suffered economic loss, and will suffer economic loss in the future including, but not limited to, future medical expenses. Plaintiff has suffered other special and general damages, which will be proved with specificity at the time of trial. These damages have continued to the present and will continue for the rest of Plaintiff's life.

V. PRAYER FOR RELIEF

WHEREFORE Plaintiffs prays for the following relief against the Defendants:

26. For judgment against Defendants for past, present and future general and special damages in amounts to be proven at the time of trial;

27. Reasonable attorney's fees and/or statutory attorney's fees where allowed under Washington Statutes and/or case law;

28. For all costs and expenses incurred herein;

29. For prejudgment interest;

1 30. For such other and further relief to be proven at the time of trial as the Court may
2 deem just and equitable.

3
4 DATED this 2nd day of June, 2022.

5 **ROBERT D. BOHM, PLLC**

6 /s/ Robert D. Bohm

7 Robert D. Bohm, WSBA # 42703

8 Attorney for Plaintiff
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